

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

SOUTHEAST FLOATING DOCKS, INC.,

Plaintiff,

CIVIL ACTION  
NO.: 1:05-CV-11039-EFH

v.

AGM MARINE CONTRACTORS, INC.,  
CHILDS ENGINEERING CORPORATION)  
and THE TOWN OF PROVINCETOWN,

Defendants.

/

**PLAINTIFF'S UNOPPOSED MOTION TO MOVE STATUS CONFERENCE TO  
AFTERNOON HOURS OF 10/18/07 TO AVOID SCHEDULING CONFLICT**

Petitioner respectfully requests, the Court's schedule permitting, that the status conference presently set for October 18, 2007 @ 11:00 a.m. be moved to any time during the afternoon hours of the same day.

Moving the status conference to the afternoon hours will permit undersigned counsel to travel to Boston on one of several flights available on the morning of 10/18/07, thereby avoiding a scheduling conflict based on an event in the late afternoon hours of 10/17/07. The last flight to Boston from Orlando on the 17<sup>th</sup> (in order to appear the morning of the 18<sup>th</sup>) is at approximately 7:30 p.m., requiring undersigned to check in at or before 6:30 p.m., too early to avoid the referenced conflict.

Pursuant to local rule, undersigned counsel certifies that upon contacting opposing counsel, Richard Holland, there was no objection to moving the status conference to 2:00 p.m. hours of October 18, 2007. Mass. L.R. 7.01.

WHEREFORE Plaintiff prays relief as set forth herein.

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on September 24, 2007.

/s/ Rosemary H. Hayes  
Rosemary Hanna Hayes  
Florida Bar No. 549509  
Tina L. Caraballo  
Florida Bar No. 0164275  
Hayes & Caraballo, PL  
Post Office Box 547248  
Orlando, Florida 32854-7248  
Tel. 407.649.9974 Ext. 214  
Fax 407.649.9379  
[rhayes@const-law.com](mailto:rhayes@const-law.com)  
*Counsel for Plaintiff*